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be harmonized with that in the *Premier League* Action, and vice versa:

1. Moving briefs shall be filed on or before March 5, 2010.
2. Opposition briefs shall be filed on or before April 30, 2010.
3. Reply briefs shall be filed on or before June 4, 2010.

B. Page Limits for Summary Judgment Briefs

1. The *Viacom* plaintiffs:
  - a) moving brief shall not exceed 65 pages.
  - b) opposition brief shall not exceed 65 pages.
  - c) reply brief shall not exceed 35 pages.
2. YouTube
  - a) YouTube's combined moving brief(s) in the *Viacom* and *Premier League* Actions shall not exceed 100 pages.
  - b) YouTube's combined opposition brief(s) in the *Viacom* and *Premier League* Actions shall not exceed 100 pages.
  - c) YouTube's combined reply brief(s) in the *Viacom* and *Premier League* Actions shall not exceed 55 pages.

In order to minimize duplication and burden on the Court, YouTube's summary judgment brief(s) and related papers in this Action may be consolidated with YouTube's summary judgment brief(s) and related papers submitted in the *Premier League* Action.

C. Other Understandings Related to Summary Judgment

1. No party shall submit an expert declaration in support of its moving brief.

2. No party presently intends to submit an expert declaration in connection with its opposition or reply brief(s).
3. In the event a party decides to submit an expert declaration in connection with its opposition or reply brief(s), that party shall promptly advise the opposing party of its intention to do so by providing the name of the expert to be used and the general subject matter of the expert's declaration.
4. As set forth in the Amended Rule 16(b) Order, the Parties have reserved the right to depose any expert who submits a declaration in connection with a motion for summary judgment filed by the adverse Party on the subject matters stated in such declarations. The parties also reserve the right to depose any fact witness not previously deposed who submits a declaration in connection with a motion for summary judgment filed by the adverse Party on the subject matters stated in such declarations. The Party submitting such an expert or fact witness declaration shall produce the witness for deposition expeditiously upon request.
5. Nothing set forth in this Stipulation shall be used to argue in favor of the propriety or appropriateness of submitting new evidence in connection with any party's summary judgment opposition or reply papers, including the submission of an expert declaration. However, this Paragraph shall have no effect on the scheduling and timing issues addressed in Section A above.

AGREED and STIPULATED

*Attorney for Viacom International Inc.,  
Comedy Partners, Country Music  
Television, Inc., Paramount Pictures  
Corporation, and Black Entertainment  
Television, LLC*

February 25, 2010

By: 

AGREED and STIPULATED

*Attorney for YouTube, Inc., YouTube,  
LLC and Google Inc.*

February 25, 2010

By: 

So Ordered:   
U.S.D.J.

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